

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN REINSURANCE COMPANY,)
et al.,)
Plaintiffs,) CIVIL ACTION NO: 05-11840-MLW
)
v.)
)
AMERICAN INTERNATIONAL GROUP)
and TRENWICK AMERICA)
REINSURANCE CORPORATION,)
Defendants.)

ASSENTED TO MOTION TO FILE UNDER SEAL
DEFENDANT TRENWICK AMERICA REINSURANCE CORPORATION'S
MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO REMAND AND
REPLY IN FURTHER SUPPORT OF TRENWICK'S MOTION TO STAY

Defendant Trenwick America Reinsurance Corporation ("Trenwick") hereby moves to file under seal the following pleading:

- **TRENWICK AMERICA REINSURANCE CORPORATION'S
MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO
REMAND AND REPLY IN FURTHER SUPPORT OF TRENWICK'S
MOTION TO STAY.**

Trenwick respectfully requests permission to file this pleading under seal because it references material submitted in connection with a confidential arbitration between Plaintiffs and co-defendant, American International Group ("AIG"). In accordance with the Local Rules, Trenwick respectfully request that this pleading be impounded until the final resolution of this litigation between the parties, at which time it will be retrieved by counsel for Trenwick.

WHEREFORE, it is respectfully requested that the Court grant this assented-to motion to file the above-described document under seal.

Certification Pursuant to Local Rule 7.1

Trenwick's counsel certifies that pursuant to Local Rule 7.1, counsel for Trenwick and the Plaintiffs have conferred regarding the issue presented by this motion, and Plaintiffs' counsel assented to this motion.

**TRENWICK AMERICA
REINSURANCE CORPORATION**

By its attorneys,

/s/ Eben A. Krim
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Dated: November 15, 2005

CERTIFICATE OF SERVICE

I, Eben A. Krim, counsel for Defendant Trenwick America Reinsurance Corporation, hereby certify that on November 15, 2005, I served a copy of the foregoing document by overnight delivery on all known counsel of record.

/s/Eben A. Krim
Eben A. Krim